



September 17, 2024

Superior National Forest
8901 Grand Avenue Place
Duluth, MN 55808

Submitted via online portal only

Subject: School Trust, St. Louis County, and TCF Lands Purchase #66600

Dear Forest Supervisor Hall:

MiningMinnesota is pleased to submit these comments in response to the U.S. Department of Agriculture's Forest Service (USFS) request regarding the School Trust, St. Louis County, and TCF (The Conservation Funds) Lands Purchase. MiningMinnesota is dedicated to promoting safe and environmentally responsible production of non-ferrous mineral resources in the state. Mineral production has been the primary source of revenue for Minnesota's Permanent School Fund, responsible for approximately 80% of historic school trust revenue¹.

The USFS should consider those lands that fall outside of the BWCAW, like those being purchased from TCF, as a separate action that should not be included in this purchase. The intent of the purchase of the School Trust and St. Louis County Lands within the BWCAW is markedly different from the purchase of TCF-owned private lands currently within the Superior National Forest.

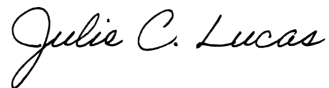
Due to the inability of the agencies to come to an agreement on the land exchange option, we recognize that the direct purchase of School Trust Lands within the boundaries of the BWCAW will infuse a one-time payment into the Public School Trust fund. This purchase will benefit over 850,000 students in public and charter schools in our State. However, we believe that a creative and thoughtful land exchange for lands where valuable minerals

¹ <https://mn.gov/school-trust-lands/lands/generating-revenue/minerals.jsp>

exist could benefit our public and charter schools in perpetuity through the potential of long-term sustainable mineral royalty payments. The hybrid model² initially agreed upon and established in Minnesota Statutes 92.80 would have been a successful compromise between the multiple parties and benefited Minnesota students to a greater extent.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Julie C. Lucas". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Julie Lucas
Executive Director, MiningMinnesota

² <https://www.revisor.mn.gov/statutes/cite/92.80>